

EXHIBIT A



**University of
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January 22, 2020

Via fax 617-310-2751

Legal Order Processing
Bank of America Financial Center

Re: **Bank Records of Absolut Residential Care, LLC**
Account No.: [REDACTED] 8590

Dear Legal Order Processing:

I represent Selena Randolph, the managing member of Absolut Residential Care, LLC. Her company maintained the above-described checking account with Bank of America during 2014. My client is involved in litigation involving a lender who wired funds and disbursed funds from this account between January and some unknown date in 2014. The defendant in this case, World Business Lenders, has demanded discovery of the complete bank statements for this account for the period January through date of closure in 2014. Judge Laplante of the United States District Court has ordered Ms. Randolph to produce these records.

I enclose a copy of Judge Laplante's Order plus an authorization signed by Selena Randolph as managing member of the LLC giving her permission for me to obtain these records. By this letter, I am asking Bank of America to reproduce copies of the complete bank statements from January 2014 to whatever date the account was closed. I believe it closed sometime in mid-2014. If your bank cannot reproduce these statements for any reason, please generate a letter explaining why the bank is unable to comply with this request so that I may show the Court and opposing counsel. If you are able to reproduce the records, I would greatly appreciate their production. It would be helpful to know how soon these might be produced so that I may inform the Court. Also, I will pay the cost of reproducing these statements.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Peter S. Wright, Jr.', enclosed within a large, loopy circular flourish.

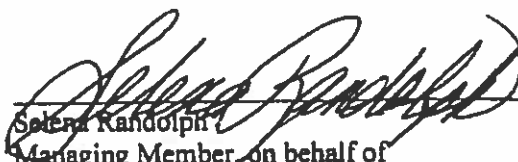
Peter S. Wright, Jr., Esquire
Director of Clinical Programs

Enclosures

RELEASE OF INFORMATION

I, Selena Randolph, managing member of Absolut Residential Care, LLC, hereby give my permission for Bank of America to release to my attorney, Civil Practice Clinic at University of New Hampshire School of Law and Peter S. Wright, Jr., Esquire, complete bank statements, including copies of all checks, on Account No. [REDACTED] 8590, for the months January 1, 2014 through December 31, 2014, or until this account was closed, if that is sooner.

JANUARY 21, 2020
Date


Selena Randolph
Managing Member, on behalf of
Absolut Residential Care, LLC

United States District Court
District of New Hampshire

Selena S. Randolph

v.

Civil No. 18-cv-730-JL

WBL SPE II, LLC, as successor
to World Business Lenders, LLC

ORDER

Defendant WBL SPE II, LLC moves the court to hold plaintiff Selena S. Randolph in contempt for failure to produce full responses to certain interrogatories and documents in response to certain requests for production that it served on the plaintiff in December 2018. Specifically, WBL requested and has not received:

- A list of tenants, the terms of occupancy, and the date of each tenancy, along with copies of all leases, for properties owned by the plaintiff, and
- Full and complete copies of all bank accounts for the plaintiff and her company, Absolut Residential Care, LLC, from January 2014 to the present, which demonstrate: (a) how the loan proceeds were spent and (b) any payments made to WBL to pay back the loan at issue.

During a status conference held March 15, 2019, the court addressed the plaintiff's failure to respond to these discovery request but did not, at that time, order their production in light of the plaintiff's subsequent bankruptcy filings. The court further

addressed this failure during a status conference held December 20, 2019, at which the plaintiff failed to appear despite being ordered to do so.¹

The court now orders the plaintiff to respond in full to these discovery requests on or before **January 10, 2020**. To the extent that water damage to certain of plaintiff's business records² prevents her from producing responsive documents, plaintiff shall undertake reasonable efforts to provide all complete and responsive information that is within her possession, custody or control. Plaintiff's failure to respond to these discovery requests and to appear as ordered may result in sanctions up to and including dismissal of the action or default judgment. See Fed.R.Civ.P. 37(b)(2)(A).

SO ORDERED.


Joseph N. Laplante
United States District Judge

Dated: December 27, 2019

cc: Peter S. Wright, Jr., Esq.
Sabrina C. Beavens, Esq.
Susan Aileen Lowry, Esq.

¹ See Notice of Hearing, December 6, 2019 ("Plaintiff Selena S. Randolph is directed to attend the conference as well."). Plaintiff's counsel attended the conference.

² The plaintiff has represented, through a signed affidavit, that certain records related to her tenancies were destroyed in a flood. See Randolph Aff't (doc. no. 27-1).